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February 9, 2013

Marlene H. Dortch, Secretary,
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EXPARTE COMMUNICATION | Wireless E911 Location Accuracy Requirements, PS Docket 07-114, and Framework for Next Generation 911 Deployment PS Docket No. 10-255

Dear Ms. Dortch:

On January 30, 2013 Paul Rauner, Founder of SirenGPS, LLC (Siren), and Dr. Kevin Thomas, Director of the Boston University Hospital Emergency Management program (BU HEM) met with Federal Communication Commission (Commission or FCC) staff to discuss Siren emergency communication systems including, but not limited to, Siren's location aware smartphone emergency text capability. FCC staff in attendance included Erika Olsen (teleconference), Zenji Nakazawa, Tim May, David Siehl, Eric Ehrenreich, Aaron Garza, and Dana Zelman of the Public Safety and Homeland Security Bureau. During this meeting, we discussed the Commission's recent negotiations with carriers to enable text to 911 as well as alternative solutions in this space related to the Commission's forthcoming report to Congress as required by the Next Generation 9-1-1 Advancement Act of 2012 which was enacted as part of the Middle Class Tax Relief Act Job Creation Act of 2012 (Pub. L. No. 112-96).

Having identified critical service gaps in emergency communication, notably the inability to process emergency text messages or reliably locate cellular callers during emergencies, Siren developed a combined dispatch and mass communication web application that works with a location aware mobile application. Distributed throughout the community, Siren's mobile application facilitates faster emergency response, improved situational awareness and critical information for first responders. Siren's tools enhance logistical management and allow real time monitoring and communication with first responders during tactical actions. Siren is working with BU HEM to conduct field operations that engage our solution in field testing by experienced incident commanders pursuant to the development of training and deployment protocols for integrating monitoring and communication systems that use location aware technology into emergency response operations.

Siren's application is carrier indifferent, providing multi-modal communication using carrier channels when available and taking advantage of the internet's disaster resilience to operate without cellular service when cell towers fail. Siren and BU HEM have collaborated on two exercises to date, with more planned. These exercises have proven the platform effective. Our October 11, 2012 exercise with the National Center For Emergency Medicine and Public Health (NCDMPH) simulated the management of Center for Disease Control (CDC) field agents during an earthquake. On December 19, 2012, Siren conducted an active shooter exercise with the Boston University Police Department recreating the Aurora Colorado tragedy. These exercises demonstrated the potential for mobile integrated emergency management, but also illustrated the need for further development of this critical technology and protocols for using it.

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In our meeting with the Commission we discussed: Siren's mobile application and the manner in which that software originates emergency communication. Tools available to a mobile application for determining location, and at a high level what Siren's mobile application is using to determine location. Functionality associated with how the Siren application determines whether an appropriate emergency text target is available and the process for "rolling" the text interface into a 911 call where text is not available. The feedback we have gotten from public service access point (PSAP) management and operations personnel as it relates to their readiness and appetite for adding text to 911 capability. Dr. Thomas provided insight into the behavioral adaptation and protocol development necessary to add text capability to the existing emergency communication infrastructure as it relates to PSAP management, emergency dispatch operations and adoption of emergency text by the public.

The Commission inquired how Siren would provide for priority delivery of emergency communication over the internet. This question appears to imply the dedication of bandwidth or some other priority delivery mechanism over infrastructure that some argue is outside the scope of the Commission's mandate. At this time Siren takes no position on this question from a technical or public policy perspective. It is our belief that there is currently no national protocol in place for providing priority to emergency communication transmitted over the internet. Siren submits that there is a need for study and clarity in this area, particularly as emergency communication evolves away from legacy systems.

Siren also brought to the attention of the Commission the lack of standardization of smart-phone operating systems with respect to enabling emergency communication tools. Siren submits to the Commission that there may be a need for study and guidance in this area as it relates to standardization of certain smartphone operating system tools or settings to enable enhanced emergency communication.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions, please contact me directly.

Sincerely,

Paul A. Rauner

Paul Rauner
SirenGPS, LLC

cc. Mr. Timothy May, FCC Public Safety and Homeland Security Bureau (FCC PSHSB)
Mr. David Siehl, FCC PSHSB
Ms. Erika Olsen, FCC PSHSB
Mr. Zenji Nakazawa, FCC PSHSB
Mr. David Siehl, FCC PSHSB
Mr. Eric Ehrenreich, FCC PSHSB
Mr. Aaron Garza, FCC PSHSB
Ms. Dana Zelman, FCC PSHSB
Dr. Kevin Thomas, BU HEM
Mr. Andrew Klein, ZWPA Strategies
Mr. Dmitry Shifrin, Bryan Cave, LLP